

Attachment F – Fact Sheet

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ATTACHMENT F – FACT SHEET

As described in Section II of Order No. R9-2005-0139, this Fact Sheet includes the specific legal requirements and detailed technical rationale that serve as the basis for the requirements of this Order.

I. PERMIT INFORMATION

Administrative information related to the IBCS is summarized in *Table 1. Facility Information*.

Table 1. Facility Information

| | |
|---|--|
| WDID | 9 00001359 |
| Discharger | City of Escondido |
| Name of Facility | City of Escondido Industrial Brine Collection System |
| Facility Address | Terminus at: 1521 S. Hale Avenue Escondido, CA 92029 San Diego County |
| Facility Contact, Title and Phone | John Burcham (Plant Superintendent), (760) 839-6273 |
| Authorized Person to Sign and Submit Reports | Patrick A. Thomas (Director of Public Works), (760) 839-4651 |
| Mailing Address | 201 N. Broadway, Escondido, CA 92025 |
| Billing Address | 201 N. Broadway, Escondido, CA 92025 |
| Type of Facility | Industrial Brine Collection System |
| Threat to Water Quality | 2 |
| Complexity | A |
| Pretreatment Program | NA |
| Reclamation Requirements | NA |
| Facility Permitted Flow | 1.2 million gallons per day |
| Facility Design Flow | 1.2 million gallons per day |
| Watershed | Pacific Ocean Shoreline, Escondido Creek |
| Receiving Water | Pacific Ocean (via San Elijo Ocean Outfall) |
| Receiving Water Type | Surface Water |

The City of Escondido (hereinafter Discharger) is the owner and operator of the Escondido Industrial Brine Collection System (hereinafter IBCS), a collection system for industrial brine wastewaters.

The Discharger proposes to discharge up to 1.2 mgd of dechlorinated industrial brine wastewater from the IBCS to the Pacific Ocean, a water of the United States, via the Escondido Land Outfall and the San Elijo Ocean Outfall.

The Discharger filed a report of waste discharge and submitted an application for Waste Discharge Requirements (WDRs) and National Pollutant Discharge Elimination System (NPDES) permit on October 25, 2004. A site visit was conducted on March 29, 2005 to observe operations and collect additional data to develop Order limitations and conditions.

II. FACILITY DESCRIPTION

In order to minimize the discharge of salts to the sanitary sewer system, the City of Escondido has constructed an Industrial Brine Collection System (IBCS). The City of Escondido proposes to allow qualified City-regulated industrial dischargers to discharge certain industrial brine wastewaters into the IBCS. Brine wastes allowed into the IBCS would include:

1. Brine wastewater or blowdown from evaporative cooling processes, and
2. Brine from reverse osmosis, water softener, and other types of water treatment processes.

These industrial processes concentrate dissolved minerals that naturally exist in potable water and recycled water supplies, resulting in elevated concentrations of total dissolved solids (TDS) in the discharge. Normal municipal wastewater treatment processes do not remove TDS, and increased concentrations of TDS can interfere with secondary biological wastewater treatment processes and adversely affect the usability of recycled water. To avoid adverse salinity impacts at the City's Hale Avenue Resource Recovery Facility (HARRF), brine industrial wastewater discharged into the IBCS will not be directed to HARRF preliminary, primary, or secondary treatment facilities. The brine wastewater discharged into the IBCS will be dechlorinated and discharged into an equalization basin that feeds directly into the City's Escondido Land Outfall (ELO) and is then directed to the San Elijo Ocean Outfall (SEOO).

The City of Escondido proposes to construct the IBCS in two phases. Phase I of the IBCS will consist of a 12-inch diameter pressure pipeline that will serve the Palomar Energy Project (PEP). PEP is a 550-megawatt power plant currently being constructed by Palomar Energy LLC, owned by an entity of Sempra Energy. PEP is located at a site approximately 0.9 miles north-northwest of HARRF. PEP will be a natural gas-fired combined cycle power plant and associated facilities. Palomar Energy proposes to initiate power generating testing operations in June 2005 using approximately 3.9 mgd of HARRF recycled water for power plant cooling.

To coincide with the projected schedule for PEP power generating testing operations, the Discharger proposes start-up of the Phase I IBCS system in June 2005. Commercial power generation operations at PEP are projected to commence later during this same month. Phase I of the IBCS would collect approximately 1.1 mgd of cooling tower blowdown, evaporative cooler blowdown, heat recovery steam generator blowdown and demineralization brine from PEP.

Phase II of the IBCS will include brine pipelines that collect brine industrial wastewater from additional industrial users within the City of Escondido. Phase II of the IBCS would collect an additional flow of approximately 0.09 mgd of cooling tower blowdown and brine wastewaters from the following industrial users:

1. Boncor (0.02 mgd of water softening and regeneration)
2. Culligan (0.017 mgd of water softening and regeneration)

3. Iceoplex (0.05 mgd of cooling tower blowdown, heat recovery generator blowdown, and demineralization brine)

Phase II of the IBCS will include a connection to the existing 49-megawatt cogeneration Iceoplex facility. HARRF recycled water will provide cooling water for the Iceoplex cooling towers and cooling tower blowdown.

The Discharger is currently working on the initial Phase II implementation tasks. The Discharger anticipates implementation of Phase II IBCS facilities within 5 years after initiating Phase I IBCS operations.

The majority of recycled water flows directed to the power plants (both Iceoplex and PEP) will be evaporated. A small percentage of the recycled water will be discharged as waste brine to the IBCS. The waste brine will contain the same mass of salt that would have been discharged to the SEOO in the absence of the power plant recycled water use. This mass of salt, however, will be concentrated in a reduced flow. Under Phase I of the IBCS, average daily City of Escondido discharges to the ELO/SEOO system (IBCS and HARRF effluent) would be reduced by approximately 2.8 mgd due to the evaporation that occurs at PEP.

Implementation of the IBCS is expected to reduce flows discharged to the SEOO by the City of Escondido. The flow reduction is also expected to reduce the potential for intermittent wet-weather stream discharges, regulated by Regional Water Board Order No. R9-2003-0394.

With the implementation of the proposed 1.2 mgd IBCS brine discharge, the combined SEOO discharge to the Pacific Ocean will consist of three effluent streams:

1. HARRF secondary and tertiary treated municipal wastewater currently regulated under Regional Water Board Order No. 99-72 (NPDES No. CA0107981),
2. Secondary treated municipal wastewater from the San Elijo Joint Powers Authority (SEJPA) San Elijo Water Reclamation Facility (SEWRF), currently regulated under Regional Water Board Order No. 99-71 (CA0107999), and
3. Dechlorinated brine industrial wastewater from the City of Escondido's IBCS.

Attachment C to Order No. R9-2005-0139 presents a schematic of how the three effluent streams will contribute to the total SEOO discharge.

The ELO has a hydraulic capacity of 27.6 mgd. The SEOO has a hydraulic capacity of 25.5 mgd. Operating capacity of SEOO is limited by the 30-inch diameter nearshore section of SEOO that has a design pressure limit of 50 feet (21.7 psi). To insure safe operating pressures within this inshore 30-inch diameter portion of SEOO, total flows through the outfall are limited to 24.3 mgd through a flow regulating valve on ELO that is actuated by a pressure transmitter in the 30-inch diameter portion of SEOO. The City of Escondido leases 79 percent of the 24.3 mgd SEOO capacity (19.2 mgd).

Currently, SEJPA is permitted to discharge up to 5.25 mgd of treated municipal wastewater to SEOO. The City of Escondido is currently permitted to discharge up to 16.5 mgd of treated municipal wastewater to SEOO. The City of Escondido has submitted an application to increase the allowable average daily HARRF discharge flow to SEOO from 16.5 mgd to 18.0 mgd. The increased flow rate for HARRF includes the additional flow volume from the IBCS (1.2 mgd).

Initially, Phase I IBCS flows will be discharged to ELO after dechlorination. By mid-2006 the Discharger expects to provide 2 million gallons of brine flow equalization prior to discharge to ELO.

During the first year of operation, the Discharger proposes to discharge IBCS flows continuously without equalization. HARRF flows will be regulated to maintain compliance with proposed combined total effluent flow of 18 mgd. HARRF flows will be controlled through various means, including:

1. Storage at Pump Station No. 77.
2. In-plant process storage.
3. The existing 2 million gallon equalization storage basin at HARRF.

After completion of the 2 million gallon brine equalization basin in mid-2006, IBCS flows will be discharged to the equalization basin prior to discharge to ELO.

A. Description of Wastewater Treatment or Controls

The City plans to regulate industries discharging brine wastewaters to the IBCS through industrial discharge permits issued under the City's existing USEPA-approved industrial discharger pretreatment program. Through the City's pretreatment program, the City has authority to establish effluent discharge standards for each regulated industry, issue industrial discharger permits, and enforce the established industrial discharge standards.

Prior to discharge into the ELO, brine industrial wastewaters collected in the IBCS will undergo dechlorination at HARRF to remove any chlorine residual. Dechlorination will occur prior to combining with the HARRF effluent. Following dechlorination, the effluent would be discharged to the ELO, then the SEOO.

The result of the HARRF recycled water use and IBCS brine return is that combined City of Escondido discharges (HARRF and IBCS) will be reduced during times of IBCS discharge. Combined total flow from both HARRF and IBCS shall not exceed 18.0 mgd.

B. Discharge Points and Receiving Waters

The Discharger proposes the eventual discharge of up to 1.2 MGD of brine wastewater or blowdown from evaporative cooling processes, and brine from reverse osmosis, water softener, and other types of water treatment processes. The combined treated wastewater is discharged

to the Pacific Ocean, Escondido Creek Hydrologic Area through the SEOO. The Outfall to the Pacific Ocean is located at 33° 00' 21" North latitude and 117° 18' 09" West longitude.

C. Summary of Existing Requirements and Self-Monitoring Report (SMR) Data

The largest industrial user (PEP) of the IBCS is not yet operable, and water quality monitoring data for Phase I are not currently available. Estimates of water quality concentrations in the IBCS discharge have been developed by the City of Escondido based on the following:

1. The type of facility contributing to Phase I IBCS flows.
2. Known qualities of wastewater from existing industries (currently discharging to the City of Escondido sanitary system) that will contribute to Phase II IBCS flows.

Because Phase I flow makes up the vast majority of the Phase I and Phase II total flow (11:1), effluent quality for physical and chemical constituents is not expected to differ greatly from Phase I and Phase II. Expected IBCS effluent quality for physical and chemical constituents are summarized in *Table 2. Projected Physical and Chemical Concentrations*.

Table 2. Projected Physical and Chemical Concentrations

| Parameter | Unit | Projected Maximum Daily Value | Projected Average Daily Value |
|---------------------------------|-------|-------------------------------|-------------------------------|
| Flow | mgd | 1.2 | 1.0 |
| Temperature (winter) | °C | 36 | 31 |
| Temperature (summer) | °C | 40 | 35 |
| pH | Units | 6 - 9 | 6 - 9 |
| Biochemical Oxygen Demand (BOD) | mg/L | <20 | <15 |
| Chemical Oxygen Demand (COD) | mg/L | <20 | <15 |
| Total Suspended Solids (TSS) | mg/L | <20 | <15 |
| Ammonia (as N) | mg/L | <20 | <10 |
| Total Chlorine Residual | mg/L | 0 | 0 |
| Grease and Oil | mg/L | <5 | <5 |

Combined flows from all Phase I and Phase II IBCS dischargers is projected to result in TDS concentrations that are approximately a factor of five (a ratio of 4.9 to 1) higher than the HARRF recycled water that would otherwise be discharged to SEOO in the absence of industrial reuse and the implementation of IBCS. Expected IBCS effluent quality for TDS is summarized in *Table 3. Projected TDS Concentrations*.

Table 3. Projected TDS Concentrations

| IBCS Phase | Facility Name | Projected Flow | Projected TDS Concentration (mg/L) |
|------------|----------------------------|----------------|------------------------------------|
| Phase I | Palomar Energy Plant (PEP) | 1.1 | 4,000 |
| Phase II | Boncor | 0.022 | 17,000 |
| | Culligan | 0.019 | 15,000 |
| | Iceoplex | 0.050 | 4,500 |

| IBCS Phase | Facility Name | Projected Flow | Projected TDS Concentration (mg/L) |
|--|---------------|----------------|------------------------------------|
| Combined Phase I and Phase II IBCS Discharge | | 1.2 | 4,400 |
| HARRF Recycled Water TDS Concentration | | -- | 900 |

Effluent quality of metals and cyanide are not expected to differ significantly from Phase I to Phase II. Water quality concentration estimates for metals and cyanide are anticipated to increase from the HARRF recycled water by a factor similar to the factor by which TDS is concentrated (a ratio of 4.9 to 1). Expected IBCS effluent quality for metals and cyanide are summarized in *Table 4. Projected Metals and Cyanide Concentrations*.

Table 4. Projected Metals and Cyanide Concentrations

| Parameter | 2003 Maximum Detected Value in HARRF Secondary Effluent (µg/L) | 2003 Mean Value for HARRF Secondary Effluent (µg/L) | Projected Maximum Concentration in IBCS Brine Effluent (µg/L) ¹ | Projected Mean Concentration in IBCS Brine Effluent (µg/L) |
|--------------------|--|---|--|--|
| Antimony | 0.51 | <5 | 2.5 | <25 |
| Arsenic | 1.38 | <3 | 6.76 | <15 |
| Beryllium | 0.07 | <0.6 | 0.34 | <3.0 |
| Cadmium | 6.2 | <2 | 30.38 | <10 |
| Chromium III | 1.14 | <1.9 | 5.59 | <9.5 |
| Chromium VI | ND | <2.0 | <10 | <10 |
| Copper | 15.8 | 11.1 | 77.42 | 55 |
| Lead | 10.9 | <6.5 | 53.41 | <33 |
| Mercury | 0.18 | <0.2 | 0.88 | <1.0 |
| Nickel | 37.7 | 14.0 | 184.73 | 70 |
| Selenium | 1.13 | <5 | 5.54 | <25 |
| Silver | 1.9 | <1.2 | 9.31 | <6.0 |
| Thallium | 2.0 | <3.4 | 9.8 | <17 |
| Zinc | 67.4 | 53.5 | 330.26 | 270 |
| Cyanide | ND | <50 | <250 | <250 |
| Phenolic Compounds | 120 | <110 | 588 | <550 |

¹ Based on 2003 maximum detected value in HARRF secondary effluent.

² ND = Non-Detect

Organic phosphate inhibitors are used for controlling biological growth within cooling tower and power generation facilities to control biological growth. No toxic organic algacides or other toxic organic compounds are proposed at PEP or are used at Iceoplex that would adversely affect IBCS effluent quality.

Data for toxic organic parameters for HARRF recycled water is not available. Data for toxic compounds in the HARRF secondary effluent at concentrations in excess of method detection limits during 2003 include chloroform; methylene chloride; phenol; 1,4-dichlorobenzene; and BHC (total).

It is anticipated that volatile compounds in the HARRF recycled water will be lost to the atmosphere. Non-volatile toxic constituents in the HARRF recycled water are expected to be concentrated by the power plant evaporative cooling and water treatment operations at a ratio at approximately 4.9 to 1. Effluent quality of toxic organic constituents are not expected to differ

significantly from Phase I to Phase II. Expected effluent quality for anticipated toxic organic constituents are summarized in *Table 5. Projected Toxic Organic Concentrations*.

Table 5. Projected Toxic Organic Concentrations

| Category | Compound | 2003 Maximum Detected Value in HARRF Secondary Effluent (µg/L) | 2003 Mean Value for HARRF Secondary Effluent (µg/L) | Projected Maximum Concentration in IBCS Brine Effluent (µg/L) ¹ | Projected Mean Concentration in IBCS Brine Effluent (µg/L) |
|----------------------------|--------------------------------------|--|---|--|--|
| Volatile Organic Compounds | Chloroform | 3.0 | <2 | ND | ND |
| | Methylene Chloride | 3.8 | <4 | ND | ND |
| | All other volatile compounds | ND | ND | ND | ND |
| Acid Extractable Compounds | Phenol | 120 | <110 | 588 | <550 |
| | All other acid extractable compounds | ND | ND | ND | ND |
| Base Neutral Compounds | 1,4-dichlorobenzene | 1.0 | <1 | 4.9 | <5 |
| | All other base neutral compounds | ND | ND | ND | ND |
| Pesticides | BHC (total) | 0.09 | <0.06 | 0.44 | <0.3 |
| | All other pesticides | ND | ND | ND | ND |

¹ Based on 2003 maximum detected value in HARRF secondary effluent.

² ND = Non-detect

Whole effluent toxicity data is not available for this discharge.

III. APPLICABLE PLANS, POLICIES, AND REGULATIONS

The requirements contained in the Order are based on the requirements and authorities described in this section.

A. Legal Authorities

This Order is issued pursuant to section 402 of the federal Clean Water Act (CWA) that implements regulations adopted by the U.S. Environmental Protection Agency (USEPA) and Chapter 5.5, Division 7 of the California Water Code (CWC). It shall serve as a National Pollutant Discharge Elimination System (NPDES) permit for point source discharges from the IBCS to a surface water of the United States. This Order establishes Waste Discharge Requirements pursuant to Article 4, Chapter 4 of the CWC.

B. California Environmental Quality Act (CEQA)

New sources as defined by the CWA must meet CEQA requirements specified in CWC 13389. The Regional Water Board has considered the environmental impact report (EIR) and concurs that there are no significant impacts on water quality and all CEQA requirements have been met. The City filed a Notice of Determination on February 27, 2003.

C. State and Federal Regulations, Policies, and Plans

1. **Basin Plan.** The Regional Water Board adopted a *Water Quality Control Plan for the San Diego Basin* (hereinafter Basin Plan) on September 8, 1994. The Basin Plan was subsequently approved by the State Water Resources Control Board (State Water Board) on December 13, 1994. Subsequent revisions to the Basin Plan have also been adopted by the Regional Water Board and approved by the State Water Board. The Basin Plan designates beneficial uses, establishes water quality objectives, and contains implementation programs and policies to achieve those objectives for all waters addressed through the plan. Beneficial uses applicable to Pacific Ocean are listed in *Table 6. Basin Plan Beneficial Uses*.

Table 6. Basin Plan Beneficial Uses of the Pacific Ocean

| Outfall Number | Receiving Water Name | Beneficial Use(s) |
|----------------|----------------------|--|
| C-001 | Pacific Ocean | <p><u>Existing:</u></p> <p>Industrial Service Supply (IND); Navigation (NAV); Contact Water Recreation (REC-1); Non-Contact Water Recreation (REC-2); Commercial and Sport Fishing (COMM); Preservation of Biological Habitats of Special Significance (BIOL); Wildlife Habitat (WILD); Rare, Threatened, or Endangered Species (RARE); Marine Habitat (MAR); Aquaculture (AQUA); Migration of Aquatic Organisms (MIRG); Spawning, Reproduction, and/or Early Development (SPWN); Shellfish Harvesting (SHELL)</p> |

Chapter 3, Water Quality Objectives, on p. 3-4 of the Basin Plan specifically states that the *Water Quality Control Plan for the Ocean Waters of California* (hereinafter, Ocean Plan) is incorporated into the Basin Plan for protection of the beneficial uses of the State ocean waters.

2. **Ocean Plan.** On November 16, 2000 the State Water Board adopted a revised Ocean Plan. The revised Ocean Plan became effective on December 3, 2001. The Ocean Plan contains water quality objectives and beneficial uses for the ocean waters of California. The beneficial uses of State ocean waters to be protected are summarized in *Table 7. Ocean Plan Beneficial Uses*.

Table 7. Ocean Plan Beneficial Uses of the Pacific Ocean

| Outfall Number | Receiving Water Name | Beneficial Use(s) |
|----------------|----------------------|---|
| C-001 | Pacific Ocean | <p>Industrial Water Supply; Water Contact and Non-Contact Recreation, Including Aesthetic Enjoyment; Navigation; Commercial and Sport Fishing; Mariculture; Preservation and Enhancement of Designated Areas of Special Biological Significance (ASBS); Rare and Endangered Species; Marine Habitat; Fish Migration; Fish Spawning and Shellfish Harvesting</p> |

In order to protect these beneficial uses, the Ocean Plan establishes water quality objectives (for bacterial, physical, chemical, and biological characteristics, and for radioactivity), general requirements for management of waste discharged to the ocean, quality requirements for waste discharges (effluent quality requirements), discharge prohibitions, and general provisions.

3. **Thermal Plan.** The State Water Board adopted a *Water Quality Control Plan for Control of Temperature in the Coastal and Interstate Water and Enclosed Bays and Estuaries of California* (hereinafter, Thermal Plan) on May 18, 1972, and amended it on September 18, 1975. The Thermal Plan contains temperature objectives for coastal surface waters.
4. **Antidegradation Policy.** 40 CFR 131.12 requires that State water quality standards include an antidegradation policy consistent with the federal policy. The State Water Board established California's antidegradation policy in State Water Board Resolution No. 68-16, which incorporates the requirements of the federal antidegradation policy. State Water Board Resolution No. 68-16 requires that existing water quality is maintained unless degradation is justified based on specific findings. As discussed in detail in this Fact Sheet, the permitted discharge is consistent with the antidegradation provision of 40 CFR 131.12 and State Water Board Resolution No. 68-16.
5. **Anti-Backsliding Requirements.** Sections 402(o)(2) and 303(d)(4) of the CWA and 40 CFR 122.44(l) prohibit backsliding in NPDES permits. These anti-backsliding provisions require effluent limitations in a reissued permit to be as stringent as those in the previous permit, with some exceptions where limitations may be relaxed. No effluent limitations have previously been established for this discharge.
6. **Monitoring and Reporting Requirements.** 40 CFR 122.48 requires that all NPDES permits specify requirements for recording and reporting monitoring results. Sections 13267 and 13383 of the CWC authorize the Regional Water Boards to require technical and monitoring reports. The Monitoring and Reporting Program (Attachment E) establishes monitoring and reporting requirements to implement federal and State requirements.
7. **Regional Water Board Order No. 99-72 (NPDES Permit for HARRF).** Existing waste discharge requirements for HARRF are contained in Order No. 99-72 (NPDES No. CA0107981), adopted by the Regional Water Board on November 10, 1999. In May 2004 an application for renewal of NPDES No. CA0107981 was submitted to the Regional Water Board to increase the allowable HARRF discharge flow limitation from 16.5 mgd to 18.0 mgd.
8. **Regional Water Board Order No. 99-71 (NPDES Permit for SEJPA discharge to SEOO).** The SEJPA discharge to SEOO is currently regulated by Regional Water Board Order No. 99-71 (NPDES No. CA0107999). Order No. 99-71 allows SEJPA to discharge up to 5.25 mgd of treated wastewater to SEOO.

D. Impaired Water Bodies on CWA 303(d) List

Section 303(d) of the CWA requires states to identify specific water bodies where water quality standards are not expected to be met after implementation of technology-based effluent limitations for point sources. For all 303(d)-listed water bodies and pollutants, the Regional Water Board plans to develop and adopt total maximum daily loads (TMDLs) that will specify waste load allocations (WLAs) for point sources and load allocations (LAs) for non-point sources, as appropriate.

The USEPA has approved the State's 303(d) list of impaired water bodies. Certain receiving waters in the San Diego County watersheds do not fully support beneficial uses and therefore have been classified as impaired on the 2002 303(d) list and have been scheduled for TMDL development.

The 2002 State Water Board's California 303(d) List classifies the Pacific Ocean Shoreline, Escondido Creek Hydrologic Area as impaired for bacteria. Currently there is no proposed date for the TMDL completion for this receiving water body.

Because the discharge from the IBCS is dechlorinated municipal water comprised of concentrated sodium chloride, magnesium ions, and calcium ions, this discharge is not likely to contribute to the bacterial impairment of the receiving water body. Further, the discharge is not expected to contain significant concentrations of bacteria. This Order does not allow the discharge of detectable levels of bacteria that would contribute to the impairment of the receiving water body.

IV. RATIONALE FOR EFFLUENT LIMITATIONS AND DISCHARGE SPECIFICATIONS

The CWA requires point source discharges to control the amount of conventional, non-conventional, and toxic pollutants that are discharged into the waters of the United States. The control of pollutants discharged is established through effluent limitations and other requirements in NPDES permits. There are two principal bases for effluent limitations: 40 CFR 122.44(a) requires that permits include applicable technology-based limitations and standards; and 40 CFR 122.44(d) requires that permits include water quality-based effluent limitations to attain and maintain applicable numeric and narrative water quality objective to protect the beneficial uses of the receiving water. Where numeric water quality objectives have not been established, three options exist to protect water quality: 1) 40 CFR 122.44(d) specifies that WQBELs may be established using USEPA criteria guidance under CWA section 304(a); 2) proposed State criteria or a State policy interpreting narrative objective supplemented with other relevant information may be used; or 3) an indicator parameter may be established.

A diffuser has been installed on the submerged discharge outfall pipe from the SEOO. Based on State Water Board modeling, the diffuser increases the initial dilution by a factor of 237:1. A dilution factor of 237:1 has been allowed for discharges of the total combined IBCS effluent. Information relevant to the modeling of the SEOO outfall is included in Attachment G.

A. Discharge Prohibitions

The discharge prohibitions are based on the requirements of the Ocean Plan, Thermal Plan, and the CWC, and are consistent with the requirements set for other discharges regulated by waste discharge requirements adopted by this Regional Water Board.

1. Compliance with Discharge Prohibitions contained in Section III.H of the Ocean Plan is a requirement of this Order.
2. Compliance with applicable Discharge Prohibitions contained in the Basin Plan is a requirement of this Order.
3. Discharges of wastes in a manner or to a location which have not been specifically authorized by this Order and for which valid waste discharge requirements are not in force are prohibited.
4. The discharge of wastewater at a rate exceeding 1.1 mgd during Phase I of IBCS operation; 1.2 mgd during Phase II of IBCS operation; or any rate that when combined with the effluent discharge rate from HARRF contributes to an exceedance of 18 mgd, is prohibited unless the Discharger obtains revised waste discharge requirements authorizing an increased discharge.
5. The discharge of polychlorinated biphenyl compounds such as those commonly used for transformer fluid at Internal Discharge Points I-001 through I-008 is prohibited.
6. Neither free available chlorine nor total residual chlorine may be discharged from any power generating unit contributing to cooling tower blowdown effluent at Internal Discharge Points I-005 and I-008 for more than 2 hours in any one day and not more than one unit in any facility may discharge free available or total residual chlorine at any one time.
7. The discharge of wastewater, that when combined with the effluent discharged from HARRF, contributes to an exceedance of the Thermal Plan and the temperature effluent limitation established in Section IV.B of this Order is prohibited.
8. Odors, vectors, and other nuisances of waste origin beyond the limits of the property controlled by the Discharger are prohibited.

B. Technology-Based Effluent Limitations

1. Scope and Authority

The CWA requires that technology-based effluent limitations be established based on several factors:

- a. Best practicable treatment control technology (BPT) is based on the average of the best performance by plants within an industrial category or subcategory. BPT standards apply to toxic, conventional, and nonconventional pollutants.
- b. Best available technology economically achievable (BAT) represents the best existing performance of treatment technologies that are economically achievable within an industrial point source category. BAT standards apply to toxic and nonconventional pollutants.
- c. Best conventional pollutant control technology (BCT) is a standard for the control from existing industrial point sources of conventional pollutants including BOD, TSS, fecal coliform, pH, and oil and grease. The BCT standard is established after evaluating the cost of attaining a reduction in pollutant discharge, the benefits that would result, and the cost effectiveness of additional industrial treatment beyond BPT.
- d. New source performance standards (NSPS) that represent the best available demonstrated control technology standards. The intent of NSPS guidelines is to set limitations that implement new treatment technology for new sources.

The CWA requires USEPA to develop effluent limitations, guidelines and standards (ELG), BPT, BCT, BAT, and NSPS. Section 402(a)(1) of the CWA and 40 CFR section 125.3 authorize the use of best professional judgment (BPJ) to develop technology-based effluent limitations on a case-by-case basis where ELGs are not available. Where BPJ is used, the permit writer must comply with 40 CFR section 125.3. None of the effluent limitations contained in this Order were established using BPJ.

Pursuant to 40 CFR section 122.2 a new source is defined as any building, structure, facility, or installation from which there is or may be a discharge of pollutants after the promulgation of effluent guidelines. The effluent guidelines for steam electric power generating point source became effective on November 19, 1982. The PEP facility is currently under construction and is thus subject to new source performance standards (NSPS). The Iceoplex cogeneration facility was constructed after November 19, 1982 and began operation in 1995 and is also subject to NSPS.

The single Phase I industrial user (PEP) is a recently built natural gas-fired combined cycle power plant and is subject to NSPS for the steam electric power generating point source category ELGs specified in 40 CFR section 423.15. According to 40 CFR section 423.11, low volume wastes are defined as wastewater from all sources except those for which specific limitations are otherwise established. Pursuant to 40 CFR section 423.15 (c), the waste brine from the on-site water treatment system is subject to meet NSPS ELG-based effluent limitations for low volume waste sources prior to commingling with any other waste streams. The cooling tower blow down effluent from PEP effluent must meet NSPS prior to commingling with other wastewaters (including all low volume wastewaters) and being discharged to the IBCS. Because the IBCS is not a publicly owned treatment works facility as defined in 40 CFR section 403.3(o), pretreatment standards for new sources are not applicable to the effluent waste stream from PEP.

During Phase II of the IBCS, Iceoplex cogeneration facility will begin to discharge to the IBCS. The Iceoplex cogeneration facility commenced operation in 1994 and currently discharges to a sanitary sewer system. The cogeneration facility includes a 41.2-megawatt combustion turbine that burns natural gas. Exhaust from the combustion turbine is ducted to a heat recovery steam generator to produce steam. High pressure steam from the heat recovery steam generator is used in a 10.2 megawatts steam turbine generator. Section 423.10 of 40 CFR establishes the ELGs for steam electric power generating point source category to discharges resulting from the operation of a generating unit by an establishment primarily engaged in the generation of electricity for distribution and sale which results primarily from a process utilization of fossil-type fuel or nuclear fuel in conjunction with a thermal cycle employing the steam water system as the thermodynamic medium. Pursuant to 40 CFR Part 423, wastewaters from the Iceoplex cogeneration facility must meet NSPS prior to commingling with other wastewaters.

The City of Escondido has applied for waste discharge requirements for the discharge of dechlorinated PEP and Iceoplex cogeneration effluent. The IBCS is acting as a conveyance for the industrial waste. Pursuant to the City of Escondido's NPDES permit application, the City of Escondido is responsible for compliance with the NSPS ELG-based effluent limitations and prohibitions.

2. Applicable Technology-Based Effluent Limitations

a. Phase I (PEP)

Pursuant to 40 CFR section 423.15, NSPS, ELGs for steam electric power generating facilities have been established in this Order. The Report of Waste Discharge (RWD) submitted to the Regional Water Board by the Discharger indicates that cooling tower blowdown, evaporative cooler blowdown, reverse osmosis brine, deionization brine, and heat recovery steam generator blowdown will be discharged into the IBCS by PEP during Phase I of the IBCS. The Discharger indicates that all other wastes from the PEP facility will be directed to the sanitary sewer.

The ELGs prohibit the discharge of polychlorinated biphenyl compounds such as those commonly used for transformer fluid in all wastewaters from the facility.

Numeric ELG-based effluent limitations applicable to all NSPS discharges and for low volume wastes have been established in this Order at Internal Discharge Points I-001 through I-004. ELG-based effluent limitations for low volume wastes are applicable for each low volume waste stream prior to commingling with other wastewaters.

The ELGs establish effluent limitations for pH. Further, concentration-based effluent limitations and mass-based effluent limitations are established for total suspended solids (TSS) and oil and grease in low volume wastes.

An internal discharge point for evaporative cooler blowdown from PEP has been established as Internal Discharge Point I-001. Mass-based limitations for Internal Discharge Point I-001 are based on a maximum peak flow of 3,000 gallons per day (gpd). An internal discharge point for reverse osmosis brine from PEP has been established as Internal Discharge Point I-002. Mass-based limitations for Internal Discharge Point I-002 are based on a maximum peak flow of 45,000 gallons per day (gpd). An internal discharge point for deionization brine from PEP has been established as Internal Discharge Point I-003. Mass-based limitations for Internal Discharge Point I-003 are based on a maximum peak flow of 3,000 gallons per day (gpd). An internal discharger point for heat recovery blowdown from PEP has been established as Internal Discharge Point I-004. Mass-based limitations for Internal Discharge Point I-004 are based on a maximum peak flow of 12,000 gallons per day (gpd). Low volume waste ELG-based effluent limitations are summarized in *Table 8. Technology Based Effluent Limitations for Internal Discharge Points I-001 through I-004.*

Table 8. Technology Based Effluent Limitations for Internal Discharge Points I-001 through I-004

| Parameter | Units | Effluent Limitations | | | |
|--|---------|----------------------|---------------|-----------------------|-----------------------|
| | | Average Monthly | Maximum Daily | Instantaneous Minimum | Instantaneous Maximum |
| PEP Evaporative Cooler Blowdown Internal Discharge Point I-001 | | | | | |
| pH | Units | -- | -- | 6.0 | 9.0 |
| TSS | mg/L | 30 | 100 | -- | -- |
| | lbs/day | 0.75 | 2.5 | -- | -- |
| Oil and Grease | mg/L | 15 | 20 | -- | -- |
| | lbs/day | 0.38 | 0.5 | -- | -- |
| PEP Reverse Osmosis Brine Internal Discharge Point I-002 | | | | | |
| pH | Units | -- | -- | 6.0 | 9.0 |
| TSS | mg/L | 30 | 100 | -- | -- |
| | lbs/day | 11.26 | 37.53 | -- | -- |
| Oil and Grease | mg/L | 15 | 20 | -- | -- |
| | lbs/day | 5.63 | 7.51 | -- | -- |
| PEP Deionization Brine Internal Discharge Point I-003 | | | | | |
| pH | Units | -- | -- | 6.0 | 9.0 |
| TSS | mg/L | 30 | 100 | -- | -- |
| | lbs/day | 0.75 | 2.5 | -- | -- |
| Oil and Grease | mg/L | 15 | 20 | -- | -- |
| | lbs/day | 0.38 | 0.5 | -- | -- |
| PEP Heat Recovery Blowdown Internal Discharge Point I-004 | | | | | |
| pH | Units | -- | -- | 6.0 | 9.0 |
| TSS | mg/L | 30 | 100 | -- | -- |
| | lbs/day | 3.0 | 10.0 | -- | -- |
| Oil and Grease | mg/L | 15 | 20 | -- | -- |
| | lbs/day | 1.5 | 2.0 | -- | -- |

ELG-based effluent limitations applicable to cooling tower blowdown effluent from PEP have been established in the Order at Internal Discharge Point I-005.

The ELGs establish effluent limitations for pH. Further, concentration-based effluent limitations are applicable to cooling tower blowdown for free available chlorine, total chromium, total zinc, the remaining priority pollutants (listed in Attachment H). The ELGs prohibit the discharge of available chlorine and total residual chlorine in cooling tower blowdown from any unit for more than two hours in any one day. Further, not more than one unit in any plant may discharge free available or total residual chlorine at any one time. Mass-based effluent limitations for cooling tower blowdown are based on a maximum peak flow of 935,000 gpd. The applicable technology-based effluent limitations for Internal Discharge Point I-005 are listed in *Table 9. Technology-Based Effluent Limitations for Internal Discharge Point I-005*.

Table 9. Technology-Based Effluent Limitations for Internal Discharge Point I-005

| Parameter | Units | Effluent Limitations | | | |
|-------------------------------|---------|----------------------|---------------|-----------------------|-----------------------|
| | | Average Monthly | Maximum Daily | Instantaneous Minimum | Instantaneous Maximum |
| pH | Units | -- | -- | 6.0 | 9.0 |
| Free available chlorine | mg/L | -- | -- | -- | 0.5 ¹ |
| | lbs/day | -- | -- | -- | 3.9 |
| Chromium, total ² | mg/L | 0.2 | 0.2 | -- | -- |
| | lbs/day | 1.6 | 1.6 | -- | -- |
| Zinc, total ² | mg/L | 1.0 | 1.0 | -- | -- |
| | lbs/day | 7.8 | 7.8 | -- | -- |
| Remaining priority pollutants | ug/L | ND ³ | -- | -- | ND ³ |

¹The ELGs establish an effluent limitation of 0.2 mg/L as an “Average concentration”. The ELGs at 40 CFR 423.11(k) define the “Average concentration” as the average of analyses made over a single period of chlorine release which does not exceed two hours. Further, 40 CFR section 423.15 (j)(2) prohibits the discharge of either free available chlorine or total residual chlorine from any unit for more than two hours in any one day and this discharge prohibition has been established in the Order.

² The effluent limitations for metals are expressed as total recoverable.

³ Detectable amounts of priority pollutants listed in Attachment H in the cooling tower blowdown effluent are prohibited.

b. Phase II (Iceoplex Cogeneration Facility)

The discharge of cooling tower blowdown and low volume waste from the Iceoplex cogeneration facility is subject to 40 CFR section 423.15, NSPS ELGs for steam electric power generating facilities. ELG-based effluent limitations have been established in this Order for the discharge of blowdown from the cogeneration facility cooling towers, brine from on-site water treatment, and blowdown from the heat recovery steam generator. The RWD submitted to the Regional Water Board by the City of Escondido indicates that a total discharge flow to the IBCS from the Iceoplex cogeneration facility is expected to be 50,000 gallons a day. The RWD further states that 90 percent of the Iceoplex cogeneration facility wastewater flow is cooling tower blowdown. Thus, ELG-based effluent limitations have been established for 45,000 gpd of cooling tower blowdown.

The ELGs prohibit the discharge of polychlorinated biphenyl compounds such as those commonly used for transformer fluid in all wastewaters from the facility.

The ELGs establish effluent limitations for pH. Further, concentration-based effluent limitations and mass-based effluent limitations are established for total suspended solids and oil and grease in low volume wastes.

An internal discharge point for brine from the on-site water treatment facility at the Iceoplex cogeneration facility has been established as Internal Discharge Point I-006. An internal discharge point for blowdown from the heat recovery steam generator at the Iceoplex facility has been established as Internal Discharge Point I-007. The Iceoplex cogeneration facility is prohibited from using Internal Discharge Points I-006 and I-007 until this Order is amended to allow their use.

ELG-based effluent limitations applicable to cooling tower blowdown effluent from the Iceoplex cogeneration facility have been established in the Order at Internal Discharge Point I-008.

The ELGs establish effluent limitations for pH. Further, concentration-based effluent limitations are applicable to cooling tower blowdown for free available chlorine, total chromium, total zinc, the remaining priority pollutants (listed in Attachment H). The ELGs prohibit the discharge of available chlorine and total residual chlorine in cooling tower blowdown from any unit for more than two hours in any one day. Further, not more than one unit in any plant may discharge free available or total residual chlorine at any one time. Mass-based effluent limitations for cooling tower blowdown are based on a maximum peak flow of 45,000 gpd. The applicable technology-based effluent limitations for Internal Discharge Point I-008 are listed in *Table 10. Technology-Based Effluent Limitations for Internal Discharge Point I-008*.

Table 10. Technology-Based Effluent Limitations for Internal Discharge Point I-008

| Parameter | Units | Effluent Limitations | | | |
|-------------------------------|---------|----------------------|---------------|-----------------------|-----------------------|
| | | Average Monthly | Maximum Daily | Instantaneous Minimum | Instantaneous Maximum |
| pH | Units | -- | -- | 6.0 | 9.0 |
| Free available chlorine | mg/L | -- | -- | -- | 0.5 ¹ |
| | lbs/day | -- | -- | -- | 0.2 |
| Chromium, total ² | mg/L | 0.2 | 0.2 | -- | -- |
| | lbs/day | 0.1 | 0.1 | -- | -- |
| Zinc, total ² | mg/L | 1.0 | 1.0 | -- | -- |
| | lbs/day | 0.4 | 0.4 | -- | -- |
| Remaining priority pollutants | ug/L | ND ³ | -- | -- | ND ³ |

¹The ELGs establish an effluent limitation of 0.2 mg/L as an “Average concentration”. The ELGs at 40 CFR 423.11(k) define the “Average concentration” as the average of analyses made over a single period of chlorine release which does not exceed two hours. Further, 40 CFR section 423.15 (j)(2) prohibits the discharge of either free available chlorine or total residual chlorine from any unit for more than two hours in any one day and this discharge prohibition has been established in the Order.

² The effluent limitations for metals are expressed as total recoverable.

³ Detectable amounts of priority pollutants listed in Attachment H in the cooling tower blowdown effluent are prohibited.

C. Water Quality-Based Effluent Limitations (WQBELs)

1. Scope and Authority

USEPA regulations at 40 CFR 122.44 (d) (1) (i) require permits to include WQBELs for pollutants (including toxicity) that are or may be discharged at levels, which cause, have reasonable potential to cause, or contribute to an excursion above any state water quality standard. For discharges to the Pacific Ocean, the Ocean Plan allows the Regional Water Board no discretion in the application of WQBELs. The Ocean Plan requires the establishment of WQBELs in discharge permits for all toxic pollutants from Table B of the Ocean Plan.

2. Applicable Beneficial Uses and Water Quality Criteria and Objectives

In order to protect the beneficial uses established in the Ocean Plan and the Basin Plan (referenced in Part III.C of this Fact Sheet), the Ocean Plan establishes water quality objectives (for bacterial, physical, chemical, and biological characteristics, and for radioactivity), general requirements for management of waste discharged to the ocean, quality requirements for waste discharges (effluent quality requirements), discharge prohibitions, and general provisions.

Table A of the Ocean Plan provides effluent limitations for conventional and certain non-conventional pollutants (including grease and oil, settleable solids, turbidity, and pH). Table B of the Ocean Plan list water quality objectives for pollutants for protection of marine aquatic life and human health (carcinogens and noncarcinogens).

Section 3 of the Thermal Plan specifies narrative waste discharge requirements for temperature into coastal waters.

3. Determining the Need for WQBELs for Priority Pollutants

Section II.D of the Ocean Plan establishes numeric water quality objectives for the protection of marine aquatic life and human health.

The Ocean Plan allows the use of a minimum probable initial dilution factor, D_m (expressed as parts seawater per part wastewater), for calculation of effluent limitations for the priority pollutant water quality objectives listed in Table B of the Ocean Plan. The Regional Water Board has determined that a dilution factor of 237:1 is applicable to the SEOO.

The IBCS is a new discharge. No effluent data for the IBCS is available to complete a reasonable potential analysis. The Discharger submitted projected effluent quality data in the Report of Waste Discharge. The projected effluent quality data are estimates based on projected source water quality from HARRE, known characteristics of existing sanitary sewer dischargers (e.g., Boncor, Culligan, Iceoplex), and water quality projections provided to the Discharger by PEP. The projected effluent quality data was utilized in-part to determine reasonable potential.

The projected maximum effluent concentrations for pollutants contained in the IBCS in *Table 4. Projected Metals and Cyanide Concentrations*, and *Table 5. Projected Toxic Organic Concentrations* were compared to the Table B water quality objectives contained in the Ocean Plan. None of the projected maximum effluent concentrations exceeded the Ocean Plan water quality objectives (with a dilution factor of 237:1). Discharges to the IBCS are not expected to contain levels of toxic metals, volatile organics, or other priority pollutants that would exceed water quality objectives.

Further, the effluent streams discharged to the IBCS that are most likely to contribute to an exceedance of WQBELs (PEP and Iceflow cogeneration facility cooling tower blowdown) have internal discharge points with technology-based effluent limitations for toxic pollutants which are significantly more stringent than WQBELs after a 237:1 dilution.

Order No. R9-2005-0139 does not contain WQBELs for individual metals and priority pollutants listed in Table B of the Ocean Plan (except chronic toxicity) for the total IBCS effluent.

Because actual data is not available to conduct a RPA, the Discharger shall conduct accelerated monitoring, as specified in Section VII.B.2.b of this Fact Sheet, for pollutants with water quality objectives specified in Table A and Table B of the Ocean Plan. A chronic toxicity effluent limitation has been established in this Order pursuant to Table B of the Ocean Plan to provide a minimum level of protection of water quality objectives.

4. Determining the Need for WQBELs for Non-Priority Pollutants

The Thermal Plan establishes narrative effluent limitations for elevated temperature wastes discharged to coastal waters. The proposed effluent temperatures for the IBCS discharge in the Report of Waste Discharge submitted to this Regional Water Board and summarized in *Table 2. Projected Physical and Chemical Concentrations* indicate elevated effluent temperatures above the ambient receiving water temperature. The IBCS demonstrates reasonable potential to exceed water quality based effluent limitations established in the Thermal Plan. Pursuant to the Thermal Plan, WQBELs for temperature have been established in Order No. R9-2005-0139.

The pollutants of grease and oil, suspended solids, settleable solids, turbidity, and pH are characteristic of all effluent discharges. Pursuant to Table A of the Ocean Plan, effluent limitations for grease and oil, suspended solids, settleable solids, turbidity, and pH are established for the discharge of IBCS effluent in Order No. R9-2005-0139.

Table A of the Ocean Plan establishes a performance-based effluent limitation for suspended solids. Table A of the Ocean Plan states that the Discharger shall, as a 30-day average, remove 75% of suspended solids from the influent stream before discharging wastewaters to the ocean, except that the effluent limitation to be met shall not be lower than 60 mg/L. The projected maximum effluent concentration for suspended solids for IBCS is <20 mg/L. Because the maximum effluent concentration for suspended solids is projected to be lower

than 60 mg/L, the requirement to remove 75% of suspended solids from the influent stream before discharging wastewaters is not applicable to this discharge and an instantaneous maximum effluent limitation of 60 mg/L has been established.

5. WQBELs Calculations

Water quality based effluent limitations are based on projected effluent quality and water quality objectives specified in Table A and Table B of the Ocean Plan (2001). WQBELs for Table A pollutants were determined pursuant to Section III.B of the Ocean Plan. The WQBEL for chronic toxicity was calculated pursuant to Section III.C of the Ocean Plan.

The process for developing a WQBEL for chronic toxicity according to Section III.C of the Ocean Plan is shown in the following example:

For each Ocean Plan Table B constituent requiring an effluent limitation, identify the applicable water quality effluent limitation contained in Table B of the Ocean Plan. Effluent limitations for water quality objectives listed in Table B, with the exception of acute toxicity and radioactivity, may be determined through the use of the following equation:

$$C_e = C_o + D_m (C_o - C_s)$$

Where C_e = The effluent concentration limit
 C_o = The concentration (water quality objective) to be met at the completion of initial dilution
 C_s = Background seawater concentration
 D_m = Minimum probable initial dilution expressed as parts seawater per part wastewater.

A dilution factor of 237 was used to calculate the effluent limitation established for chronic toxicity. Further, no background concentration of chronic toxicity was assumed. Therefore for chronic toxicity:

$$C_e = 1 \text{ TUc} + (237)(1 \text{ TUc} - 0 \text{ TUc})$$

Thus, for chronic toxicity the applicable WQBEL is:

$$C_e = 238 \text{ TUc}$$

In compliance with 40 CFR section 122.45(f), mass-based limitations have also been established in the Order for conventional, nonconventional, and toxic pollutants. Generally, mass-based limitations ensure that proper treatment, and not dilution is employed to comply with the final effluent concentration limitations. Pursuant to 40 CFR 122.45, mass-based limitations are calculated using long term average flows. Because this is a new discharge, the mass-based effluent limitations contained in the Order for the total combined IBCS effluent are based on a maximum total discharge flow rate of 1.1 MGD

during Phase I of IBCS operation, and 1.2 MGD during Phase II of IBCS operation, established for Discharge Point C-001. When calculating the mass-based limitations for discharges, the appropriate flow, instantaneous maximum limitations for instantaneous maximum mass calculations, and the 30-day average limitations when calculating the 30-day average mass, should be substituted in the following equation:

$$\text{Mass (lbs/day)} = \text{flow rate (MGD)} * 8.34 * \text{effluent limitation (mg/L)}$$

where: mass = mass limitation for a pollutant (lbs/day)
effluent limitation = concentration limitation for a pollutant (mg/L)
flow rate = discharge flow rate (MGD)

Using the monthly average effluent limitation for grease and oil at Discharge Point C-001 during Phase II operation of the IBCS as an example, the following equation demonstrates how water quality based effluent limits were established for this Order.

$$\text{Mass (lbs/day)} = 1.2 \text{ (MGD)} * 8.34 * 25 \text{ (mg/L)} = 250 \text{ lbs/day}$$

Pursuant to 40 CFR section 122.45(f), and outlined in this Fact Sheet, the WQBELs summarized in *Table 11. Summary of WQBELs for Combined Discharge Point C-001* have been established in the Order:

Table 11. Summary of WQBELs for Combined Discharge Point C-001

| Parameter | Units | Effluent Limitations | | | | | Basis ¹ |
|-------------------------------|---------------------------------|----------------------|----------------|---------------|-----------------------|-----------------------|--------------------|
| | | Average Monthly | Average Weekly | Maximum Daily | Instantaneous Minimum | Instantaneous Maximum | |
| Temperature | °F | 2 | | | | | TP |
| pH | units | -- | -- | -- | 6.0 | 9.0 | OP |
| Oil and Grease | mg/L | 25 | 40 | -- | -- | 75 | OP |
| | Phase I - lbs/day ³ | 229 | 367 | -- | -- | 688 | |
| | Phase II - lbs/day ⁴ | 250 | 400 | -- | -- | 750 | |
| Turbidity | NTU | 75 | 100 | -- | -- | 225 | OP |
| Settleable Solids | ml/L | 1.0 | 1.5 | -- | -- | 3.0 | OP |
| Suspended Solids | mg/L | -- | -- | -- | -- | 60 | OP |
| | Phase I -lbs/day ³ | -- | -- | -- | -- | 550 | |
| | Phase II - lbs/day ⁴ | -- | -- | -- | -- | 600 | |
| Chronic Toxicity ⁵ | TUc | -- | -- | 238 | -- | -- | OP |

1 OP = Ocean Plan; TP = Thermal Plan.

2 The maximum temperature of the effluent shall not exceed the natural temperature of receiving waters by more than 20 °F at any time.

3 Mass-based effluent limitations have been calculated based on a maximum daily flow of 1.1 MGD. These mass-based effluent limitations are applicable during the Phase I operation of the IBCS.

4 Mass-based effluent limitations have been calculated based on a maximum flow value of 1.2 MGD. These mass-based effluent limitations are applicable during the Phase II operation of the IBCS.

5 Compliance with the effluent limitation for chronic toxicity shall be determined as specified in Section IV.C.6 of this Fact Sheet.

6. Whole Effluent Toxicity (WET)

The 2001 Ocean Plan establishes numeric objectives for chronic toxicity in Section II.D, Table B, with a chronic toxicity daily maximum effluent objective of 1.0 (TU_c). Based on methods of the Ocean Plan (2001) with a minimal initial dilution of 237:1, a maximum daily effluent limitation of 238 TU_c for chronic toxicity is required. Pursuant to Section III.C.3.c of the Ocean Plan, the Discharger shall conduct chronic toxicity monitoring.

Chronic toxicity is to be calculated using the following formula:

$$TU_c = \frac{100}{NOEL}$$

Where: No Observed Effect Level (NOEL) is expressed as the maximum percent effluent or receiving water that causes no observable effect on a test organism, as determined by the result of a critical life stage toxicity test as listed in Appendix II of the 2001 Ocean Plan.

If toxicity effluent limitations established in the Order are exceeded, then, within 15 days of the exceedance, the Discharger shall begin conducting six additional toxicity tests over a six-month period and provide the results to the Regional Water Board. If the additional monthly toxicity tests indicate that toxicity effluent limitations are being consistently violated, the Regional Water Board may require the Discharger to complete a toxicity reduction evaluation (TRE) and Toxic Identification Evaluation (TIE).

D. Final Effluent Limitations

Pursuant to 40 CFR section 423.15, the final effluent limitations in Table 12. *Final Effluent Limitations for Internal Discharge Points I-001 through I-004* have been established in the Order for low volume waste discharges at Internal Discharge Points I-001 through I-004.

Table 12. Final Effluent Limitations for Internal Discharge Points I-001 through I-004

| Parameter | Units | Effluent Limitations | | | |
|--|---------|----------------------|---------------|-----------------------|-----------------------|
| | | Average Monthly | Maximum Daily | Instantaneous Minimum | Instantaneous Maximum |
| PEP Evaporative Cooler Blowdown Internal Discharge Point I-001 | | | | | |
| pH | Units | -- | -- | 6.0 | 9.0 |
| TSS | mg/L | 30 | 100 | -- | -- |
| | lbs/day | 0.75 | 2.5 | -- | -- |
| Oil and Grease | mg/L | 15 | 20 | -- | -- |
| | lbs/day | 0.38 | 0.5 | -- | -- |
| PEP Reverse Osmosis Brine Internal Discharge Point I-002 | | | | | |
| pH | Units | -- | -- | 6.0 | 9.0 |
| TSS | mg/L | 30 | 100 | -- | -- |
| | lbs/day | 11.26 | 37.53 | -- | -- |
| Oil and Grease | mg/L | 15 | 20 | -- | -- |
| | lbs/day | 5.63 | 7.51 | -- | -- |
| PEP Deionization Brine Internal Discharge Point I-003 | | | | | |

| Parameter | Units | Effluent Limitations | | | |
|--|---------|----------------------|---------------|-----------------------|-----------------------|
| | | Average Monthly | Maximum Daily | Instantaneous Minimum | Instantaneous Maximum |
| pH | Units | -- | -- | 6.0 | 9.0 |
| TSS | mg/L | 30 | 100 | -- | -- |
| | lbs/day | 0.75 | 2.5 | -- | -- |
| Oil and Grease | mg/L | 15 | 20 | -- | -- |
| | lbs/day | 0.38 | 0.5 | -- | -- |
| PEP Heat Recovery Blowdown Internal Discharge Point I-004 | | | | | |
| pH | Units | -- | -- | 6.0 | 9.0 |
| TSS | mg/L | 30 | 100 | -- | -- |
| | lbs/day | 3.0 | 10.0 | -- | -- |
| Oil and Grease | mg/L | 15 | 20 | -- | -- |
| | lbs/day | 1.5 | 2.0 | -- | -- |

Pursuant to 40 CFR section 423.15, the final effluent limitations in Table 13. *Final Effluent Limitations for Internal Discharge Point I-005* have been established in the Order at Internal Discharge Point I-005.

Table 13. Final Effluent Limitations for Internal Discharge Point I-005

| Parameter | Units | Effluent Limitations | | | |
|-------------------------------|---------|----------------------|---------------|-----------------------|-----------------------|
| | | Average Monthly | Maximum Daily | Instantaneous Minimum | Instantaneous Maximum |
| pH | Units | -- | -- | 6.0 | 9.0 |
| Free available chlorine | mg/L | -- | -- | -- | 0.5 ¹ |
| | lbs/day | -- | -- | -- | 3.9 |
| Chromium, total ² | mg/L | 0.2 | 0.2 | -- | -- |
| | lbs/day | 1.6 | 1.6 | -- | -- |
| Zinc, total ² | mg/L | 1.0 | 1.0 | -- | -- |
| | lbs/day | 7.8 | 7.8 | -- | -- |
| Remaining priority pollutants | ug/L | ND ³ | -- | -- | ND ³ |

¹The ELGs establish an effluent limitation of 0.2 mg/L as an “Average concentration”. The ELGs at 40 CFR 423.11(k) define the “Average concentration” as the average of analyses made over a single period of chlorine release which does not exceed two hours. Further, 40 CFR section 423.15 (j)(2) prohibits the discharge of either free available chlorine or total residual chlorine from any unit for more than two hours in any one day and this discharge prohibition has been established in the Order.

² The effluent limitations for metals are expressed as total recoverable.

³ Detectable amounts of priority pollutants listed in Attachment H in the cooling tower blowdown effluent are prohibited.

Pursuant to 40 CFR section 423.15, the final effluent limitations in Table 14. *Final Effluent Limitations for Internal Discharge Point I-008* have been established in the Order at Internal Discharge Point I-008.

Table 14. Final Effluent Limitations for Internal Discharge Point I-008

| Parameter | Units | Effluent Limitations | | | |
|-------------------------------|---------|----------------------|---------------|-----------------------|-----------------------|
| | | Average Monthly | Maximum Daily | Instantaneous Minimum | Instantaneous Maximum |
| pH | Units | -- | -- | 6.0 | 9.0 |
| Free available chlorine | mg/L | -- | -- | -- | 0.5 ¹ |
| | lbs/day | -- | -- | -- | 0.2 |
| Chromium, total ² | mg/L | 0.2 | 0.2 | -- | -- |
| | lbs/day | 0.1 | 0.1 | -- | -- |
| Zinc, total ² | mg/L | 1.0 | 1.0 | -- | -- |
| | lbs/day | 0.4 | 0.4 | -- | -- |
| Remaining priority pollutants | ug/L | ND ³ | -- | -- | ND ³ |

¹The ELGs establish an effluent limitation of 0.2 mg/L as an “Average concentration”. The ELGs at 40 CFR 423.11(k) define the “Average concentration” as the average of analyses made over a single period of chlorine release which does not exceed two hours. Further, 40 CFR section 423.15 (j)(2) prohibits the discharge of either free available chlorine or total residual chlorine from any unit for more than two hours in any one day and this discharge prohibition has been established in the Order.

² The effluent limitations for metals are expressed in total recoverable.

³ Detectable amounts of priority pollutants listed in Attachment H in the cooling tower blowdown effluent are prohibited.

Pursuant to 40 CFR section 122.45(f), the final effluent limitations summarized in *Table 15. Summary of Final Effluent Limitations for Combined Discharge Point C- 001* have been established in the Order for the total combined IBCS effluent at Combined Discharge Point C-001.

Table 15. Summary of Final Effluent Limitations for Combined Discharge Point C-001

| Parameter | Units | Effluent Limitations | | | | | Basis ¹ |
|-------------------------------|---------------------------------|----------------------|----------------|---------------|-----------------------|-----------------------|--------------------|
| | | Average Monthly | Average Weekly | Maximum Daily | Instantaneous Minimum | Instantaneous Maximum | |
| Temperature | °F | ² | | | | | TP |
| pH | units | -- | -- | -- | 6.0 | 9.0 | OP |
| Oil and Grease | mg/L | 25 | 40 | -- | -- | 75 | OP |
| | Phase I - lbs/day ³ | 229 | 367 | -- | -- | 688 | |
| | Phase II - lbs/day ⁴ | 250 | 400 | -- | -- | 750 | |
| Turbidity | NTU | 75 | 100 | -- | -- | 225 | OP |
| Settleable Solids | ml/L | 1.0 | 1.5 | -- | -- | 3.0 | OP |
| Suspended Solids | mg/L | -- | -- | -- | -- | 60 | OP |
| | Phase I -lbs/day ³ | -- | -- | -- | -- | 550 | |
| | Phase II - lbs/day ⁴ | -- | -- | -- | -- | 600 | |
| Chronic Toxicity ⁵ | TUc | -- | -- | 238 | -- | -- | OP |

¹ OP = Ocean Plan; TP = Thermal Plan.

² The maximum temperature of the effluent shall not exceed the natural temperature of receiving waters by more than 20 °F at any time.

³ Mass-based effluent limitations have been calculated based on a maximum daily flow of 1.1 MGD. These mass-based effluent limitations are applicable during the Phase I operation of the IBCS.

- 4 Mass-based effluent limitations have been calculated based on a maximum flow value of 1.2 MGD. These mass-based effluent limitations are applicable during the Phase II operation of the IBCS.
- 5 Compliance with the effluent limitation for chronic toxicity shall be determined as specified in Section IV.C.6 of this Fact Sheet.

V. RATIONALE FOR RECEIVING WATER LIMITATIONS

Narrative and numerical receiving water limitations have been established in Order No. R9-2005-0139 based on water quality objectives specified in the Ocean Plan to ensure the reasonable protection of beneficial uses and the prevention of nuisance.

The discharge of waste through Combined Discharge Point C-001 shall not cause violation of the 2001 Ocean Plan water quality objectives. Compliance with the water quality objectives shall be determined from samples collected at monitoring stations determined by the Regional Water Board.

VI. MONITORING AND REPORTING REQUIREMENTS

Section 122.48 of 40 CFR requires all NPDES permits to specify recording and reporting monitoring results. Sections 13267 and 13383 of the California Water Code authorize the Regional Water Boards to require technical and monitoring reports. The Monitoring and Reporting Program (MRP), Attachment E of this Order, establishes monitoring and reporting requirements to implement federal and State requirements. The following provides the rationale for the monitoring and reporting requirements contained in the MRP for the IBCS.

A. Effluent Monitoring

Effluent monitoring requirements at internal monitoring points have been established to determine compliance with technology-based effluent limitations at internal discharge points. Semi-annual effluent monitoring requirements for pH, TSS, and oil and grease have been established to determine compliance with effluent limitations at Internal Discharge Points I-001 through I-004, and I-006 through I-007 in Order No. R9-2005-0139 and summarized in Section IV.D of this Fact Sheet. Semi-annual effluent monitoring requirements for pH, free available chlorine, total chromium, and total zinc have been established to determine compliance with effluent limitations at Internal Discharge Points I-005 and I-008 in Order No. R9-2005-0139 and summarized in Section IV.D of this Fact Sheet. In addition, annual monitoring for the remaining priority pollutants (listed in Attachment H) has been established at Internal Discharge Points I-005 and I-008.

Effluent monitoring requirements for Internal Discharge Points I-001 through I-004 and I-006 through I-007 are listed in *Table 16. Effluent Monitoring Requirements for Internal Discharge Points of Low Volume Wastes*.

Table 16. Effluent Monitoring Requirements for Internal Discharge Points of Low Volume Wastes

| Constituent ¹ | Units | Sample Type | Frequency |
|--------------------------|----------------------|-------------------------|-------------|
| Flow ² | GPD | Continuous | Continuous |
| pH | Units | Grab/Continuous | Semi-annual |
| Total Suspended Solids | mg/L | 24-hr composite | Semi-annual |
| | lbs/day ³ | Calculated ³ | |
| Oil and Grease | mg/L | Grab | Semi-annual |
| | lbs/day ³ | Calculated ³ | |

¹ All parameters shall be analyzed by the methods specified in 40 CFR section 136.3.

² Flow shall be monitored prior to combining with any other effluent stream (including other low volume wastes).

³ lbs/day shall be calculated by the discharger for each monitoring event using the following formula:

$$\text{lbs/day} = 0.00834 * \text{effluent concentration limit (ug/L)} * Q$$

where: Q = flow rate, million gallons per day (MGD)

Effluent monitoring requirements for Internal Discharge Points I-005 and I-008 are listed in *Table 17. Effluent Monitoring Requirements for Internal Discharge Points of Cooling Tower Blowdown*.

Table 17. Effluent Monitoring Requirements for Internal Discharge Points of Cooling Tower Blowdown

| Constituent ¹ | Units | Sample Type | Frequency |
|--|----------------------|-------------------------|-------------|
| Flow ² | MGD | Continuous | Continuous |
| pH | Units | Grab/Continuous | Semi-annual |
| Free Available Chlorine | µg/L | Grab/Continuous | Semi-annual |
| | lbs/day ³ | Calculated ³ | |
| Chromium, total | mg/L | 24-hr composite | Semi-annual |
| | lbs/day ³ | Calculated ³ | |
| Zinc, total | ml/L | Grab | Semi-annual |
| Remaining Priority Pollutants ⁴ | µg/L | 24-hr composite | Annual |

¹ All parameters shall be analyzed by the methods specified in 40 CFR section 136.3.

² Flow shall be monitored prior to combining with effluent from HARRF and after combining with effluent from HARRF.

³ lbs/day shall be calculated by the discharger for each monitoring event using the following formula:

$$\text{lbs/day} = 0.00834 * \text{effluent concentration limit (ug/L)} * Q$$

where: Q = flow rate, million gallons per day (MGD)

⁴ The Discharger shall monitor for the remaining priority pollutants listed in Attachment H of Order No. R9-2005-0139.

Effluent monitoring requirements for temperature, pH, oil and grease, turbidity, settleable solids, suspended solids, and chronic toxicity have been established to evaluate compliance with the final effluent limitations for the total combined flow from IBCS in Order No. R9-2005-0139 and summarized in Section IV.D of this Fact Sheet.

The Discharger shall conduct effluent monitoring for pH, oil and grease, turbidity, settleable solids, suspended solids, and chronic toxicity prior to the combined total IBCS effluent combining with any other flow (e.g., HARRF effluent).

The IBCS effluent is not expected to meet Thermal Plan requirements prior to commingling with HARRF effluent. The City of Escondido, being owner and operator of both the HARRF and IBCS facilities, has indicated that temperature limitations can be met by blending HARRF

effluent and IBCS effluent. The Discharger shall conduct effluent monitoring for temperature after the IBCS effluent and HARRF effluent combine, and prior to the addition of San Elijo WRF effluent or any other waste stream, for the purpose of determining compliance with the temperature effluent limitation.

The IBCS will collect chlorinated wastewaters from various industrial users. Effluent monitoring for total residual chlorine has been established to evaluate the need for future WQBELs for residual chlorine effluent limitations and ensure the protection of water quality and aquatic life.

Priority pollutant monitoring has been established to determine if the total combined IBCS effluent has reasonable potential to discharge priority pollutants exceeding water quality objectives listed in Table B of the Ocean Plan and evaluate the need for additional WQBELs.

Effluent monitoring requirements for the total combined flow from the IBCS applicable to the Discharger are listed in *Table 18. Effluent Monitoring Requirements for Combined Discharge Point C-001*.

Table 18. Effluent Monitoring Requirements for Combined Discharge Point C-001

| Constituent ¹ | Units | Sample Type | Frequency |
|----------------------------------|----------------------|-------------------------|--------------|
| Flow ² | MGD | Continuous | Continuous |
| pH | Units | Grab/Continuous | Weekly |
| Residual Chlorine | µg/L | Grab/Continuous | Weekly |
| | lbs/day ³ | Calculated ³ | |
| Temperature | °F | Grab/Continuous | Weekly |
| Total Suspended Solids | mg/L | 24-hr composite | Monthly |
| | lbs/day ³ | Calculated ³ | |
| Settleable Solids | ml/L | Grab | Monthly |
| Oil and Grease | mg/L | Grab | Monthly |
| | lbs/day ³ | Calculated ³ | |
| Turbidity | NTU | 24-hr composite | Monthly |
| Chronic Toxicity | TUc | 24-hr composite | Annually |
| Priority Pollutants ⁴ | µg/L | 24-hr composite | ⁵ |

¹ All parameters shall be analyzed by the methods specified in 40 CFR section 136.3.

² Flow shall be monitored prior to combining with effluent from HARRF and after combining with effluent from HARRF.

³ lbs/day shall be calculated by the discharger for each monitoring event using the following formula:

$$\text{lbs/day} = 0.00834 * \text{effluent concentration limit (ug/L)} * Q$$

where: Q = flow rate, million gallons per day (MGD)

⁴ The Discharger shall monitor for the priority pollutants as specified in Attachment H of Order No. R9-2005-0139.

⁵ Priority Pollutant monitoring shall be conducted quarterly during the first year of facility operation, and one more time approximately one year prior to the expiration date of the permit. Additional priority pollutant monitoring requirements are summarized in Section VII.B.2.b of this Fact Sheet.

All monitoring procedures (including whole effluent toxicity testing procedures) must comply with monitoring procedures specified in Appendix III of the Ocean Plan and 40 CFR section 136.3.

The MRP should be reviewed for greater detail regarding specific monitoring requirements.

B. Whole Effluent Toxicity Testing Requirements

Whole effluent toxicity testing shall be conducted by the methods specified in Section IV.C.6 of this Fact Sheet and Section IV of the MRP.

C. Receiving Water Monitoring

In order to determine compliance with the Thermal Plan and the thermal effluent limitation established in the Order, the City shall conduct weekly monitoring of the receiving water for temperature, as specified in Section V of the MRP.

VII. RATIONALE FOR PROVISIONS

A. Standard Provisions

Standard Provisions, which in accordance with 40 CFR 122.41 and 122.42, apply to all NPDES discharges and must be included in every NPDES permit, are provided in Attachment D to the Order.

B. Special Provisions

1. Re-Opener Provisions

- a. This Order may be re-opened to include effluent limitations for toxic constituents determined to be present in significant amounts in the discharge by this Regional Water Board.
- b. This Order may be re-opened and modified, to incorporate in accordance with the provisions set forth in 40 CFR Parts 122 and 124, to include requirements for the implementation of the watershed management approach.
- c. This Order may be re-opened and modified, in accordance with the provisions set forth in 40 CFR Parts 122 and 124, to include new minimum level (ML).
- d. This Order may be re-opened and modified to revise effluent limitations because of Basin Plan Amendments, such as an update of an objective or the adoption of a Total Maximum Daily Load (TMDL).
- e. This Order may be re-opened upon submission of adequate information by the Discharger, as determined by this Regional Water Board, to provide for dilution credits or a mixing zone, as may be appropriate.
- f. This Order may also be re-opened and modified, revoked, and reissued or terminated in accordance with the provisions of 40 CFR sections 122.44, 122.62 to 122.64, 125.62, and 125.64. Causes for taking such actions include, but are not limited to, failure to

comply with any condition of this Order and permit, and endangerment to human health or the environment resulting from the permitted activity.

2. Special Studies and Additional Monitoring Requirements

Core monitoring may include intake monitoring, effluent monitoring, receiving water monitoring, and groundwater monitoring. This Order includes core monitoring for effluent. In addition to core monitoring requirements, the Discharger may be required to conduct additional monitoring. Special studies are intended to be short-term and designed to address specific research or management issues that are not addressed by the routine core monitoring program. The Discharger shall implement special studies as directed by this Regional Water Board.

- a. The Discharger shall participate and coordinate with state and local agencies and other dischargers in the San Diego Region in development and implementation of a regional monitoring program for the Pacific Ocean as directed by this Regional Water Board. The intent of a regional monitoring program is to maximize the efforts of all monitoring partners using a more cost-effective monitoring design and to best utilize the pooled resources of the region. During a coordinated sampling effort, the Discharger's sampling and analytical effort may be reallocated to provide a regional assessment of the impact of discharges to the receiving water.
- b. This Regional Water Board is requiring, as part of the MRP, that the Discharger conduct effluent monitoring for the priority pollutants as specified in Attachment H.

This monitoring shall be conducted at the following locations:

- 1) Total Combined IBCS Effluent Discharge Point C-001. Monitoring of the IBCS effluent shall be conducted prior to the IBCS effluent commingling with any other waste streams (prior to discharge into the ELO).
- 2) Receiving water (for pH only). Samples for pH shall be collected at offshore water quality monitoring stations described in Attachment E to Order No. R9-2005-0101, NPDES No. CA0107981. Sampling shall occur at frequencies that are concurrent with the monitoring protocol outlined in Attachment E to Order No. R9-2005-0101; NPDES No. CA0107981. The results shall be used to determine compliance with the Thermal Plan for the discharge from the IBCS.

The Discharger shall conduct two priority pollutant monitoring studies as specified in Attachment H. The first monitoring study shall be conducted quarterly for the first year of facility operation (four monitoring events). The results of the quarterly priority pollutant monitoring shall be submitted to this Regional Water Board within 3 months of completing the fourth monitoring event, and no later than November 1, 2006. The second priority pollutant monitoring study requires the Discharger to conduct priority pollutant monitoring approximately one year prior to the permit expiration date as established in Section VI.A of the MRP (Attachment E). The final priority pollutant monitoring event

shall be conducted between March 1, 2009 and April 31, 2009 and include Phase II effluent if possible. The results of the second priority pollutant monitoring study shall be submitted at least 180 days prior to the expiration date of this Order and shall be submitted with the Report of Waste Discharge.

3. Best Management Practices and Pollution Prevention

The Discharger must establish an industrial users evaluation and regulatory program which will establish discharge regulations, discharge prohibitions, and requirements under which industrial dischargers will be allowed to discharge to the IBCS.

VIII. PUBLIC PARTICIPATION

This Regional Water Board is considering the issuance of waste discharge requirements (WDR) that will serve as a National Pollutant Discharge Elimination System (NPDES) permit for City of Escondido's Industrial Brine Collection System. This Regional Water Board has developed tentative WDRs. This Regional Water Board encourages public participation in the WDR adoption process.

A. Notification of Interested Parties

This Regional Water Board has notified the Discharger and interested agencies and persons of its intent to adopt waste discharge requirements for the discharge and has provided them with an opportunity to submit their written comments and recommendations. Notification was provided through publication in the North County Times on May 7, 2005 and by letter mailed to interested parties on May 9, 2005.

B. Written Comments

Interested persons are invited to submit written comments regarding the WDR. Comments should be submitted either in person or by mail, during business hours, to:

John H Robertus, Executive Officer
Attn: POTW Compliance Unit
Regional Water Quality Control Board, San Diego Region
9174 Sky Park Court, Suite 100
San Diego, California 92123

To ensure that this Regional Water Board has the opportunity to fully consider written material, comments regarding Order No. R9-2005-0139 should be received in the Regional Water Board's office no later than 5:00 p.m. on May 27, 2005. Written material submitted after 5:00 p.m. on June 1, 2005 will not be provided to the Regional Water Board members and will not be considered by this Regional Water Board. Oral comments will be received at the hearing on June 8, 2005.

C. Public Hearing

The Regional Water Board will hold a public hearing on the tentative WDRs during its regular Board meeting on the following date and time and at the following location:

Date: June 8, 2005
Time: 9:00 a.m.
Location: Regional Water Quality Control Board
Regional Water Board Meeting Room
9174 Sky Park Court, Suite 100
San Diego, California 92123

Interested persons are invited to attend. At the public hearing, the Regional Water Board will hear testimony, if any, pertinent to the discharge, WDRs, and Order. Oral testimony will be heard; however, for accuracy of the record, important testimony should be in writing.

Please be aware that dates and venues may change. Our web address is **<http://www.waterboards.ca.gov/sandiego>** where you can access the current agenda for changes in dates and locations.

D. Waste Discharge Requirements Petitions

Any aggrieved person may petition the State Water Resources Control Board to review the decision of the Regional Water Board regarding the final WDRs. The petition must be submitted within 30 days of the Regional Water Board's action to the following address:

State Water Resources Control Board
Office of Chief Counsel
P.O. Box 100, 1001 I Street
Sacramento, CA 95812-0100

E. Information and Copying

For additional information, interested persons may write the following address or contact Bryan Ott of the Regional Water Board by e-mail at BOtt@waterboards.ca.gov or by phone at (858) 637-5589.

Regional Water Quality Control Board, San Diego Region
Attn: Executive Officer
9174 Sky Park Court, Suite 100
San Diego, California 92123

Copies of the applications, NPDES waste discharge requirements, and other documents (other than those that the Executive Officer maintains as confidential) are available at the Regional Water Board office for inspections and copying according to the following schedule (excluding holidays):

| | |
|------------------------|-------------------------|
| Monday and Thursday: | 1:30 p.m. to 4:30 p.m. |
| Tuesday and Wednesday: | 8:30 a.m. to 11:30 a.m. |
| | 1:30 p.m. to 4:30 p.m. |
| Friday: | 8:30 a.m. to 11:30 a.m. |

An electronic copy of the Fact Sheet and Order can be accessed on the Regional Water Board website: <http://www.waterboards.ca.gov/sandiego>.

F. Register of Interested Persons

Any person interested in being placed on the mailing list for information regarding the WDRs and NPDES permit should contact this Regional Water Board, reference this Facility, and provide a name, address, and phone number.